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Hon. A. Kathleen Tomlinson, USMJ
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

RE: *Orellana v. New Food Corp., et al.*, 18-cv-7466 (JMA)(AKT)

Dear Judge Tomlinson:

I represent the Plaintiff in the above referenced matter. Today is the deadline to respond to written discovery requests.

I respectfully request an extension of the date to respond to outstanding discovery requests until tomorrow, September 24, 2020. The reason for this request is that Plaintiff's responses have been prepared, but the Plaintiff is coming to my office tomorrow for a final review and to execute the verification of interrogatories.

I also request an extension of the deadline for Defendants' to respond to Plaintiff's First Request for Production of Documents and First Set of Interrogatories to October 5, 2020. The reason for this request is that Plaintiff's discovery requests were served on August 17, 2020 (ten days after the Court determined deadline), and Plaintiff therefore consented to an extension of Defendants' time to respond to said demands in order for Defendants to have the same amount of time to respond as was afforded to Plaintiff.

In view of the above, it is respectfully requested that that Discovery Status Conference currently scheduled for October 5, 2020 at 11:00 a.m. be adjourned and rescheduled in order to allow the parties to complete the paper discovery and meet and confer regarding any issues with the responses in advance of the conference as required pursuant to the Court's direction. This is the first request for an adjournment.

Defendants consent to this request.

Respectfully submitted,

Steven J. Moser